

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

NELSON L. BRUCE,

Plaintiff,

v.

PENTAGON FEDERAL CREDIT UNION

a/k/a PENTAGON FEDERAL CREDIT

UNION FOUNDATION, EXPERIAN

INFORMATION SOLUTIONS, INC.,

TRANS UNION, LLC, EQUIFAX

INFORMATION SERVICES, LLC,

LEXISNEXIS RISK SOLUTIONS, INC., and

UNKNOWN DOES 1-100,

Defendants.

CASE NO.: 2:22-cv-02211-BHH-MGB

**DEFENDANT TRANS UNION LLC'S RESPONSE IN
OPPOSITION TO PLAINTIFF'S MOTION FOR PROTECTIVE ORDER**

COMES NOW, Defendant Trans Union LLC ("Trans Union"), and files this Response in Opposition to Plaintiff's Motion for Protective Order, and would respectfully show the Court as follows:

I. BACKGROUND

1. On May 9, 2024, Trans Union served its First Set of Interrogatories and First Requests for Production on Plaintiff. On June 9, 2024, Plaintiff served his Discovery Responses, but failed to sufficiently answer Trans Union's Interrogatories and Requests for Production.

2. On July 1, 2024, counsel for Trans Union and Plaintiff met and conferred telephonically in a good faith attempt to resolve the discovery disputes. Plaintiff served his First Supplemental responses to Trans Union's First Set of Interrogatories and Requests for Production on July 22, 2024, however, these supplemental responses remained deficient.

3. On August 5, 2024, Trans Union filed a Motion to Compel Plaintiff's Discovery Responses, ("Motion to Compel"). *See* ECF No. 230.

4. Plaintiff filed his Opposition to Trans Union's Motion to Compel on August 20, 2024. ECF No. 244. That same day, Plaintiff filed a Motion for a Protective Order, claiming that the discovery sought by Trans Union is "invasive of his privacy" and is "intended to harass rather than to obtain relevant information." ECF No. 246 at pg. 1.

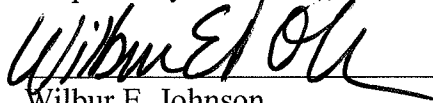
5. On August 27, 2024, Trans Union filed its Reply to Support of its Motion to Compel Plaintiff's Discovery Responses. *See* ECF No. 253.

6. Plaintiff filed his Motion for Protective Order on August 20, 2024, claiming that the discovery sought by Trans Union is "invasive of his privacy" and is "intended to harass rather than to obtain relevant information." ECF No. 246 at pg. 1.

7. As Plaintiff's Motion for Protective Order is redundant of his Response to Trans Union's Motion to Compel and entirely unnecessary, Trans Union incorporates by reference the arguments set forth in its Motion to Compel (ECF No. 230) and its Reply to Plaintiff's Opposition to Trans Union's Motion to Compel (ECF No. 253).

For the foregoing reasons, Trans Union respectfully requests that the Court deny Plaintiff's Motion for Protective Order in its entirety, and for such other and further relief as this Court deems just.

Respectfully Submitted,



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CERTIFICATE OF SERVICE

I hereby certify that on the 3rd day of September 2024, I have electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing (NEF) to counsel of record registered to use the CM/ECF system in this action, as follows:

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I further certify that I forwarded a copy of the foregoing by U.S. First Class Mail to the following non-CM/ECF participants:

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